



**S P I R E L A W**

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**Via Electronic Filing**

**February 27, 2023**

The Honorable Judge Kiyo A. Matsumoto  
Hanyzkiewicz v. Gonchez Realty Corp.  
U.S. District Court, Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, NY 11201

Re.: Hanyzkiewicz v. Gonchez Realty Corp. (1:22-cv-07514)

Dear Judge Matsumoto:

We represent Defendants, Gonchez Realty Corp. ("Defendants"), in the above-referenced matter. Defendants were served on February 13, 2023. Based on that service, the current deadline for Defendants to respond to the Complaint is March 6, 2023.

The undersigned counsel, files this letter motion on behalf of Defendants, with Plaintiff's consent, respectfully requesting an extension of time for Defendants to answer, move, or otherwise respond to the Complaint to April 5, 2023. Defendants request the extension of time to respond to the Complaint as Defendants recently retained undersigned counsel and is in the process of intaking and reviewing Defendants' files relevant to the underlying litigation.

This is Defendants' first request for an extension of time to respond to the Complaint.

Plaintiff does not oppose an extension of Defendants' time to respond to the Complaint so that Defendants may adequately respond to the Complaint and the parties may explore potentially resolving this matter. We thank the Court for its attention to this matter.

Respectfully,

Ian E. Smith, Esq.  
Partner, Spire Law, LLC